

DATE OF THE WALL

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PAY-TEL COMMUNICATIONS-INC.

July 29, 1994

The Honorable Reed E. Hundt Federal Communications Commission 1919 M Street, N.W. Washington, D.C. 20554 RECEIVED
AUG 1 1994

Re: CC Docket No. 92-77 - Opposition to Billed Party Prefere FCC NAIL FOOM

Dear Chairman Hundt,

My company, Pay Tel Communications, Inc. was formed in 1986. Today we operate 500+ coin payphones and 600+ inmate telephones in Virginia, North Carolina and South Carolina. We employ 20 people full time and 35 people part time. We strongly oppose Billed Party Preference because it will erode our already thin margins and force us out of business.

We are very proud of our record of regulatory compliance in all three states where we operate and with the FCC. We are proud of our record of charging fair and reasonable rates. In North Carolina we have operated from the beginning of the private payphone industry with rates for intra-state calls capped at dominant carrier rates. We are proud of the fact that we filed an FCC Informational Tariff in 1991 and a non-dominant carrier tariff in 1993 for inter-state calls charging fair and reasonable rates.

We are also very proud of the innovative programs competition in our industry has brought to consumers. Pay Tel Communications was the first payphone provider in North Carolina to allow our customers to Call Anywhere in the US for \$.25 per minute on coin sent calls. Our Pay Tel Advantage Program offers free public service calls and Enhanced Services (News, Sports, Weather and Information Services) for \$.25 a minute. Competition in our industry has brought many worth while benefits to consumers.

We are committed to ridding our industry of the "bad apples" that are overcharging the public. We have succeeded in North Carolina through the North Carolina Payphone Association's Self Enforcement Program and the diligent work of the North Carolina Utilities Commission Public Staff in stopping overcharging on intra-state calls. Pay Tel Communications has invested a sizable amount of money in advertising in state and national publications to help educate clients on the importance of charging consumers fair and reasonable rates (Attachments A, B, C, & D).

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We need you help. Please have the FCC mandate rate ceilings and provide that if a company is shown to have a problem with overcharging make the penalty so stiff it drives them out of business. I want to personally commit to you and the FCC that I will do everything within my power to see that the rate ceilings are supported and any offenders are turned over to your enforcement division.

We have tremendous respect for the FCC's responsibility to regulate the telecommunication's industry. As the Chairman of the FCC, you have a very difficult task. Pay Tel Communications has also faced a very difficult task in surviving in the payphone industry while competing against the deep pockets of Southern Bell in a state where our rates are capped at dominant carrier rates. We have finally succeeded, only to face the grim possibility of seeing BPP eliminate our profits and force us into bankruptcy.

We would like to have the opportunity to continue our business, provide a future for our employees and their families and prove to you and the FCC that the responsible payphone providers can clean up our industry's "bad apples."

Respectfully submitted,

Vincent Townsend

President

VT/dk

Enclosures

cc: The Honorable James H. Quello

The Honorable Andrew C. Barrett

The Honorable Rachelle B. Chong

The Honorable Susan Ness

The Honorable Howard Coble

The Honorable Jesse Helms

The Honorable Lauch Faircloth

WHO REALLY PAYS YOUR INMATE PHONE SERVICE COMMISSIONS?

THE CITIZENS OF YOUR AREA!



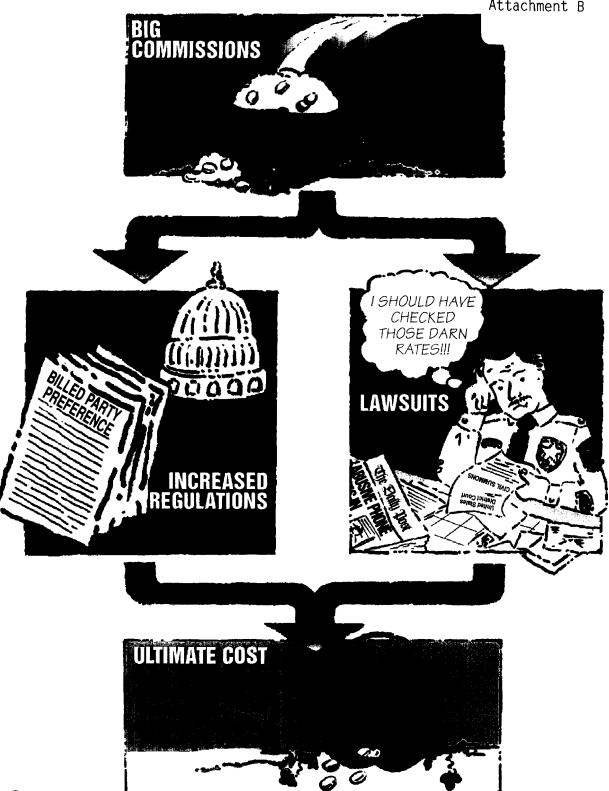


Committed to Protecting Our Clients and Serving the Public.

IF IT SEEMS TOO GOOD TO BE TRUE

TPROBABLY IS! Pay Tel Communications, Inc. July 29, 1994

Attachment B





Committed to Protecting Our Clients and Serving the Public.

WHO REALLY PAYS YOUR PAYPHONE COMMISSIONS? YOUR CUSTOMERS DO!





The Company That's Committed to its Clients and Their Customers.

PAY-TEL

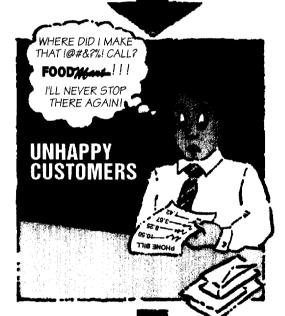
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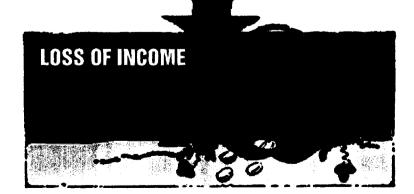
IT PROBABLY IS! Pay Tel Communications, Inc. July 29, 1994

Attachment D











The Company That's Committed to its Clients and Their Customers.